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June 27, 2012

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Amendment of Part 27 of the Commission's rules to Govern the
Operation of Wireless Communications Services in the 2.3 GHz Band,*
WT Docket No. 07-293; IB Docket No. 95-91; GEN Docket No. 90-357
**WRITTEN EX PARTE PRESENTATION – JOINT SUBMISSION WITH
PROPOSALS THAT RESOLVE OPEN ISSUES ON RECONSIDERATION**

Dear Ms. Dortch:

Gogo, Inc. ("Gogo") has reviewed the *ex parte* filing that AT&T Inc. ("AT&T") and Sirius XM Radio Inc ("Sirius XM") submitted on June 15, 2012 in the captioned proceedings (the "Submission"). By the Submission, AT&T and Sirius XM presented a proposal that would permit efficient use of WCS spectrum in band without presenting interference concerns to neighboring spectrum licenses held by Sirius XM.

Gogo supports this submission because it is an innovative recommendation that resolves interference issues that have delayed the use of this spectrum for over a decade.

In particular, Gogo supports the exclusion of mobile and portable transmission in the C & D blocks and supports the use of the C & D blocks for broadband-related uses such as fixed

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operations, wireless backhaul, and unidirectional transmission like Gogo's Ground-to-Air transmissions. Gogo urges the Commission to clarify that Ground-to-Air transmissions are a permissible use (since it is transmission from a fixed source and only reception at a mobile/aircraft) and that Ground-to-Air may operate at power levels of at least a 5dB over current BTS transmit power for the WCS licenses. Gogo also urges the Commission to clarify that Ground-to-Air service coverage, measured at an altitude at or above 10,000 feet above ground, shall constitute a valid means of satisfying the build out requirements for the C&D blocks.

Gogo believes that the WCS spectrum can be put to use quickly, if the Commission accepts the AT&T/Sirius recommendation to modify the WCS technical rules.

Gogo fully supports this statement in the Submission, and will continue its efforts to put WCS Blocks C and D into productive use.

Respectfully submitted,

/s/ Thomas Gutierrez

Counsel for Gogo, Inc.